## IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE: : Bankruptcy No. 13-70218-JAD

Lisa M. Keyser, :

Debtor : Chapter 13

:

Lisa M. Keyser, : Docket No. 51

Movant :

vs. : Hearing Date & Time: October 20, 2017

1:30 PM

Atlantic Credit and Finance, Inc. : assignee from Capital One Bank, :

**Respondent**:

## <u>CERTIFICATION OF NO OBJECTION REGARDING THE MOTION TO AVOID</u> <u>JUDICIAL LIEN WITH ATLANTIC CREDIT AND FINANCE, INC.</u> <u>ASSIGNEE FROM CAPITAL ONE BANK</u>

I, Jessica L. Tighe, Legal Assistant for the Law Offices of Kenny P. Seitz certify I am over the age of eighteen years old under penalty of perjury that I served or caused to be served, on the 10th day of October, 2017, no answer, objection, or other responsive pleading to the Motion to Avoid Lien with Atlantic Credit and Finance, Inc. assignee from Capital One Bank filed on September 21, 2017, has been received. The undersigned further certifies that the Court's docket in this case has been reviewed and no answer, objection or other responsive pleading to the Motion to Avoid Lien with Atlantic Credit and Finance, Inc. assignee from Capital One Bank appears thereon. Pursuant to the Notice of Hearing, objections to the Motion to Avoid Lien with Atlantic Credit and Finance, Inc. assignee from Capital One Bank were to be filed and served no later than October 9, 2017.

It is hereby respectfully requested that the Order attached to the Motion to Avoid Lien with Atlantic Credit and Finance, Inc. assignee from Capital One Bank be entered by the Court.

Date: October 10, 2017 /s/ Kenneth P. Seitz, Esquire

Kenneth P. Seitz, Esquire

PA I.D. # 81666

Law Offices of Kenny P. Seitz P.O. Box 211, Ligonier, PA 15658

(814) 536-7470 Attorney for Debtor